

Lawrence J. Semenza, III, Esq., Bar No. 7174
Email: ljs@skrlawyers.com
Christopher D. Kircher, Esq., Bar No. 11176
Email: cdk@skrlawyers.com
Jarrod L. Rickard, Esq., Bar No. 10203
Email: jlr@skrlawyers.com
Katie L. Cannata, Esq., Bar No. 14848
Email: klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

*Attorneys for Plaintiff Megan E. Klatt
and all others similarly situated*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MEGAN E. KLATT, an individual, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

DIGNITY HEALTH, a California
corporation; DOES 1-50, unknown
individuals; and ROE COMPANIES 1-50,
unknown business entities,

Defendants.

Case No.: 2:17-cv-02425-RFB-BNW

**STIPULATION AND ORDER TO
CONTINUE SETTLEMENT
DOCUMENTS DEADLINE**

Plaintiff Megan E. Klatt and all others similarly situated ("Klatt") and Dignity Health ("Dignity") (collectively, the "Parties"), by and through their respective counsel of record, hereby submit this Stipulation and Order to Continue Settlement Documents Deadline (the "Stipulation").

On February 28, 2019, the Parties attended mediation and subsequently reached a settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order to Suspend Dispositive Motion Deadlines Pending Settlement ("Stipulation to Suspend"), requesting that the dispositive motion deadlines be suspended while the Parties worked diligently to draft and agree upon the requisite settlement documents.

1 Given the Parties' settlement, on April 10, 2019, the Court issued an Order Granting the
2 Stipulation to Suspend and directed the Parties to file a stipulation to dismiss or dispositive motions
3 by May 17, 2019.

4 The Parties are currently in the process of finalizing a host of complex and lengthy
5 settlement documents, including a Joint Motion for Preliminary Approval of Class Action
6 Settlement and the associated Joint Stipulation of Settlement, which will require Court approval.
7 As such, the Parties respectfully request an additional forty-five (45) days to submit the necessary
8 settlement documents, up to and including July 1, 2019.

9 This Stipulation is submitted in good faith and not for the purpose of delay.

10 Dated this 16th day of May, 2019.

11 SEMENZA KIRCHER RICKARD

12 /s/ Lawrence J. Semenza, III

13 Lawrence J. Semenza, III, Esq., Bar No. 7174

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Las Vegas, Nevada 89145

17 *Attorneys for Plaintiff Megan E. Klatt*
18 *and all others similarly situated*

19 Dated this 16th day of May, 2019.

20 JACKSON LEWIS, P.C.

21 /s/ Kristen A. Milton

22 Kristen A. Milton, Esq., Bar No. 14401

23 3800 Howard Hughes Parkway, Suite 600

24 Las Vegas, Nevada 89169

Attorneys for Defendant Dignity Health

25 **IT IS SO ORDERED.**

26 
27 **UNITED STATES MAGISTRATE JUDGE**

28 **DATED:** May 17, 2019